

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible	)	WC Docket No. 09-197
for Universal Service Support	)	
	)	
APPLIED RESEARCH DESIGNS, INC.	)	
	)	
Petition for Streamlined Designation as a	)	
Lifeline Broadband Provider Eligible	)	
Telecommunications Carrier	)	

**PETITION OF APPLIED RESEARCH DESIGNS, INC. FOR STREAMLINED  
DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

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November 30, 2016

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## SUMMARY

Applied Research Designs, Inc. (“AR Designs”) hereby petitions the Commission for designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier (“LBP ETC”), with streamlined consideration, in order to provide Lifeline-supported broadband internet access service (“BIAS”) in delineated non-rural, non-Tribal areas in the state of Illinois, specifically, in three zip codes in the south side of Chicago. AR Designs is highly and uniquely qualified to provide service as a LBP in its designated service area. Through a combination of its own facilities and engineering expertise coupled with leased network access arrangements, it has provided BIAS service to mixed-income residents of Chicago on an uninterrupted basis since 2004, and currently provides BIAS service to over 1,800 non-Lifeline customers. Accordingly, AR Designs is well prepared to offer fixed wireless BIAS services as a Lifeline provider to qualifying low-income households upon designation as a LBP ETC by the Commission, and qualifies for expedited review and streamlined treatment of this petition under the *2016 Lifeline Modernization Order*.

AR Designs is a certificated Minority Business Enterprise (MBE) with a proven track record of providing broadband service and adoption programs to low income communities. For over a decade, AR Designs has been an internet access services provider for Oakwood Shores, a community developed and managed by The Community Builders, Inc., a national nonprofit real estate developer that manages more than 11,000 mixed-income apartment units throughout the nation. AR Designs is partnering with The Community Builders and with the leading non-profit organizations EveryoneOn and ConnectHome in helping to eliminate the digital divide by making high-speed, low-cost Internet service and computers and free digital literacy courses

accessible to unconnected Americans in technologically underserved and economically depressed communities.

AR Designs certifies that it will comply with all Commission rules for LBP ETCs, including all applicable minimum service standards applicable to Lifeline support under the Commission's revised Lifeline rules. Moreover, to protect the integrity of the Lifeline program and guard against waste, fraud, and abuse, AR Designs will comply with the revised rules regarding subscriber eligibility verification, certification and recordkeeping, and auditing requirements. AR Designs will certify and recertify subscribers' eligibility for the Lifeline program in full compliance with existing section 54.410 of the Commission's rules until the Commission's new National Verifier has been launched in its designated service area in Illinois, and then will enroll subscribers through the National Verifier pursuant to the new provisions of section 54.410.

AR Designs understands that both affordable broadband access *and* digital literacy training are critical to further advance the Commission's goal of broadband adoption in low-income communities. With more than a decade of experience as a fixed wireless broadband provider, partnerships with outreach and digital literacy organizations like EveryoneOn/ConnectHome, and a commitment to expand its services to increase the availability of broadband service for low-income Americans, AR Designs is an ideal candidate for expedited LBP ETC designation under the Commission's streamlined designation process.

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**I. INTRODUCTION**

Applied Research Designs, Inc. (“AR Designs”) d/b/a Bandwidth Community Network (“BC NET”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended<sup>1</sup> and Sections 54.201 and 54.202 of the Commission’s rules,<sup>2</sup> by its undersigned counsel, respectfully submits this Petition for Designation as a Lifeline Broadband Provider Eligible Telecommunications Carrier (“LBP ETC”) for the sole purpose of qualifying for Lifeline support for the provision of broadband internet access service (“BIAS”) in non-rural areas of the state of Illinois; specifically, in zip codes 60653, 60615, and 60637 ( the “Designated Service Area”).<sup>3</sup>

Designation of AR Designs as a LBP ETC will further the Commission’s overarching policy goals

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<sup>1</sup> 47 U.S.C. § 214(e)(6).

<sup>2</sup> 47 C.F.R. §§ 54.201, 54.202.

<sup>3</sup> See *Wireline Competition Bureau Provides Guidance Regarding Designation as a Lifeline Broadband Provider and Lifeline Broadband Minimum Service Standards*, WC Docket No 11-42 et al., Public Notice, DA 16-1118, ¶ 11 (WCB Sept. 30, 2016) (“LBP Public Notice”).

of “ensur[ing] the availability of broadband service for low-income Americans,”<sup>4</sup> and “encourag[ing] market entry and increas[ing] competition among Lifeline providers.”<sup>5</sup>

Pursuant to the Commission’s *2016 Lifeline Modernization Order*,<sup>6</sup> as discussed in more detail below, AR Designs satisfies the requirements for designation as an LBP ETC on a streamlined, “deemed granted” basis and is able and prepared to offer Lifeline-supported BIAS service throughout the Designated Service Area. Through a combination of its own facilities and engineering expertise coupled with leased network access arrangements, AR Designs has provided internet access service, bandwidth, and network services to mixed-income communities in the City of Chicago on an uninterrupted basis since 2004, and currently provides BIAS service to over 1,800 non-Lifeline customers. Accordingly, AR Designs is prepared to offer fixed wireless BIAS services to qualifying low-income households in the Designated Service Area upon designation as a LBP ETC by the Commission, and qualifies for expedited review and streamlined treatment of this petition under the *2016 Lifeline Modernization Order*.<sup>7</sup> Grant of AR Designs’ Petition will clearly promote the public interest and particularly the Commission’s primary goal for the newly reformed, BIAS-centric Lifeline program by expanding “the availability of broadband service for low-income Americans.”<sup>8</sup>

## II. OVERVIEW

AR Designs is incorporated in the State of Illinois with principal offices located at 25245 Trelliage Ave., Plainfield, IL 60585. It is a certified Minority Business Enterprise (MBE) in the

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<sup>4</sup> See *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3971 ¶ 29. (2016) (“*2016 Lifeline Modernization Order*”).

<sup>5</sup> See *id.* at 4040 ¶ 217.

<sup>6</sup> *Id.* at 4066 ¶ 282.

<sup>7</sup> *Id.* at 4065 ¶¶ 277-78.

<sup>8</sup> See *id.* at 3971 ¶ 29.

City of Chicago and the State of Illinois.<sup>9</sup> Since 2004, AR Designs has been an internet access services provider for Oakwood Shores, a community developed and managed by The Community Builders, Inc. (<http://www.tcbinc.org/>), a national nonprofit real estate developer that owns or manages more than 11,000 low-income, senior and mixed-income apartment units in communities throughout the United States.

The Oakwood Shores community is a mixed-income community consisting of a blend of subsidized housing, affordable housing and market rate housing components. Oakwood Shores is located about three miles south of downtown Chicago in an area where most communities are economically depressed and technologically underserved due to a dearth of advanced telecommunications infrastructure. AR Designs and The Community Builders have endeavored to independently provide an affordable means of broadband access to the residents of Oakwood Shores by offering broadband as an included utility or amenity for residents, requiring no out-of-pocket charge to the residents, relying on private, federal and state grants to support the internet network program. AR Designs now seeks to expand this model into a permanent, sustainable vehicle for providing affordable, high-quality BIAS services, initially to low income residents of Oakwood Shores and the surrounding community, and eventually to many similar communities developed and managed by The Community Builders in the midwest, New England and eastern seaboard regions of the United States, including communities in Illinois, Indiana, Ohio, Kentucky, Michigan, Massachusetts, Connecticut, Rhode Island, New Jersey, New York, Pennsylvania, Maryland, Washington, DC, Virginia, and North Carolina.<sup>10</sup>

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<sup>9</sup> See **Exhibit 1** hereto and discussion *infra*.

<sup>10</sup> As these future plans materialize, AR Designs would follow the procedure set forth in new section 54.202(e) of the Commission's rules and described in paragraph 280 of the *2016 Lifeline Modernization Order*. See 47 C.F.R. § 54.202(e); *2016 Lifeline Modernization Order*, 31 FCC Rcd at 4066 ¶ 280.

In an effort to optimize the deployment and adoption of broadband service for the benefit of these low-income populations, AR Designs and The Community Builders have formed partnerships with EveryoneOn and its affiliate ConnectHome. EveryoneOn (<http://everyoneon.org/>) is a national nonprofit organization working to eliminate the digital divide by making high-speed, low-cost Internet service and computers and free digital literacy courses accessible to unconnected Americans in technologically underserved and economically depressed communities. ConnectHome (<http://connecthome.hud.gov/>) is a collaborative pilot program of EveryoneOn and the U.S. Department of Housing and Urban Development (HUD) to connect children and families in HUD-assisted housing with access to high-speed Internet. EveryoneOn collaborates with libraries, training centers, schools and other nonprofits to advertise free computer and Internet courses at over 8,000 training sites across the country. AR Designs is committed to working with EveryoneOn and low-income developers and managers like The Community Builders to provide affordable broadband connectivity to low income families and individuals.

Testimonial letters of support for AR Designs' LBP ETC application by its partners EveryoneOn and The Community Builders are appended hereto at **Exhibit 2.**

With more than a decade of experience as a fixed wireless broadband provider, partnerships with outreach and digital literacy organizations like EveryoneOn/ConnectHome, and a commitment to expand its services to increase “the availability of broadband service for low-income Americans,”<sup>11</sup> AR Designs is an ideal candidate for LBP ETC designation under the Commission’s streamlined designation process.

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<sup>11</sup> 2016 Lifeline Modernization Order, 31 FCC Rcd at 3971 ¶ 29.



### **III. AR DESIGNS MEETS THE REQUIREMENTS FOR LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

As described below, AR Designs satisfies all of the statutory and regulatory requirements for designation as a LBP ETC in the proposed Designated Service Area, and has provided a discussion of each requirement below.

#### **A. The FCC Has Authority to Grant the Requested Designation**

In the *2016 Lifeline Modernization Order*, the Commission created “a unified, streamlined FCC ETC designation process for providers seeking to receive reimbursement for providing BIAS.”<sup>12</sup> The Commission further found that individual state designations for the LBP ETC designation “would thwart federal universal service goals and broadband competition,” and accordingly preempted such state designations.<sup>13</sup> AR Designs seeks to provide BIAS service to consumers throughout the proposed Designated Service Area. Pursuant to the Commission’s revised rules and section 214(e)(6) of the Act,<sup>14</sup> AR Designs is not subject to state ETC designation jurisdiction, and AR Designs may seek designation as a LBP ETC for its non-rural, non-Tribal Designated Service Area directly from the Commission.<sup>15</sup>

#### **B. This Petition Qualifies for Streamlined Treatment**

Under section 54.202(d) of the Commission’s revised Lifeline rules, a petition for LBP ETC designation qualifies for streamlined treatment if the provider: (1) serves at least 1,000 non-Lifeline customers with voice telephone service and/or BIAS at the time of the filing; and

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<sup>12</sup> *Id.* at ¶ 239.

<sup>13</sup> *Id.* at ¶ 229.

<sup>14</sup> 47 U.S.C. § 214(e)(6)

<sup>15</sup> *2016 Lifeline Modernization Order*, 31 FCC Rcd at 4044-4063, ¶¶ 229-273. AR Designs notes that some recent objections to certain LBP petitions are inapposite to the instant petition, which seeks authority to serve only non-rural, non-Tribal communities in Illinois.

(2) has offered broadband services to the public for at least the two years preceding the filing, without interruption.<sup>16</sup>

AR Designs meets the requirements for 60-day streamlined LBP ETC designation. As described throughout this petition, AR Designs has provided, without interruption, fixed wireless BIAS service to residents of its Oakwood Shores (Chicago) service area since 2004. Inasmuch as AR Designs has not yet been designated as a Lifeline service provider, all of AR Designs' subscribers to date have been non-Lifeline subscribers. As of the date of this filing, AR Designs serves over 1,800 non-Lifeline subscribers with high-speed Wi-Fi internet access. Indeed, AR Designs has consistently served over 1,000 BIAS subscribers over the past four years. Accordingly, AR Designs meets the Commission's criteria for receiving streamlined, 60-day "deemed granted" treatment of its LBP ETC application.<sup>17</sup>

**C. AR Designs Certifies That It Will Comply With the Service Requirements Applicable to Lifeline Support (47 C.F.R. § 54.202(a)(1))**

In accordance with 47 C.F.R. § 54.202(a)(1)(i), AR Designs hereby certifies that it will comply with all the service requirements, including all applicable minimum service standards, applicable to Lifeline support under the Commission's revised rules.<sup>18</sup>

As described throughout this Petition, AR Designs currently provides BIAS service. At present, AR Designs offers fixed wireless broadband at symmetrical speeds up to 150 Mbps and maintains an uncapped usage allowance, and as shown in section G *infra*, its initial LBP service will offer 300 mbps download and 150 mbps upload speeds. AR Designs' modern fiber-based redundant network will allow AR Designs to maintain compliance with the evolving Lifeline minimum service requirements. AR Designs commits to providing compliant BIAS service to

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<sup>16</sup> 47 C.F.R. § 54.202(d)(1). *See* LBP Public Notice.

<sup>17</sup> *See id.*

<sup>18</sup> 47 C.F.R. § 54.202(a)(1)(i).

all qualified low income consumers throughout its proposed Designated Service Area as the minimum service standards for qualifying BIAS are increased annually.<sup>19</sup>

**D. AR Designs Will Remain Functional in Emergency Situations (47 C.F.R. § 54.202(a)(2))**

In accordance with 47 C.F.R. § 54.202(a)(2), AR Designs commits to remaining functional in emergency situations, and certifies that the network over which its BIAS service is provided is capable of remaining functional in such situations.<sup>20</sup> Specifically, AR Designs maintains a reasonable amount of back-up power to ensure functionality in the absence of an external power source. AR Designs is also able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.<sup>21</sup> Therefore, AR Designs is able to provide its customers with the same level of functionality in emergency situations as provided during normal periods.

Throughout its operating history, AR Designs has maintained a standard of excellence during emergency situations, due in part to its partnership with Windstream Communications (“Windstream”) that permits distribution of bandwidth through direct fiber-to-facilities and redundant fixed wireless point-to-point microwave links to underserved communities. Each underserved community location is installed with Wi-Fi (802.11ac) based multipoint equipment that connects to residents’ computers, tablets, and mobile phones. Power to Windstream’s data center facility is provided via two utility lines, in addition to an emergency utility line; and all lines carry 8MVA electric output. All power cabling is installed in either conduit or seal-tight flexible conduit with compliant connections to all equipment. There are three distinct UPS rooms with equipment that automatically accommodates 0 – 4 MW load variations.

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<sup>19</sup> See LBP Public Notice.

<sup>20</sup> 47 C.F.R. § 54.202(a)(2). See LBP Public Notice.

<sup>21</sup> See *id.*

**E. AR Designs Will Satisfy Applicable Consumer Protection and Service Quality Standards (47 C.F.R. § 54.202(a)(3))**

AR Designs commits to continuing compliance with all applicable service quality standards and consumer protection rules.<sup>22</sup> Specifically, AR Designs hereby certifies that it will comply with all applicable state and federal consumer protection and service quality standards, that it understands its consumer protection obligations under the Communications Act and its implementing rules, including but not limited to any applicable rules regarding unjust or unreasonable practices, discrimination, and relevant enforcement provisions in the Act and the Commission's rules, and that it is prepared to comply with those obligations and any future amendments or additions thereto.<sup>23</sup> AR Designs commits to comply with the CTIA Consumer Code for Wireless Service and any amendments thereto.

**F. AR Designs Is Financially and Technically Capable of Providing Lifeline Service in Compliance with the Commission's Rules (47 C.F.R. § 54.202(a)(4))**

AR Designs is financially and technically qualified to provide Lifeline-supported BIAS service in compliance with the Commission's rules, including the program's new minimum service standards, throughout the entire Designated Service Area.<sup>24</sup> These qualifications are proven by the fact that AR Designs has been the established Internet supplier for The Community Builders at the Oakwood Shores community since 2004, and its user base has grown to over 1,800 residents. During this 12-year period it has provided uninterrupted, reliable Internet access service without the benefit of Lifeline funding.<sup>25</sup> After designation, it will continue and expand its service

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<sup>22</sup> 47 C.F.R. § 54.202(a)(3). See LBP Public Notice.

<sup>23</sup> See 47 U.S.C. §§ 201, 202, 206-209, 216-217, 222, 225, 251(a)(2), 255, 617, 619; 47 CFR §§ 1.80, 1.701-1.736, 6.3, 6.5, 6.9, 7.1, 7.5, 8.3, 8.5, 8.7, 8.9, 8.12-8.17, 14.20(c), 64.604-64.605.

<sup>24</sup> 47 C.F.R. § 54.202(a)(4).

<sup>25</sup> See **Exhibit 2** hereto.

offerings and will market BIAS service to both Lifeline and non-Lifeline-eligible consumers in the Designated Service Area.

In partnership with Windstream, AR Designs enables carrier-grade connectivity and network diversity by fiber and digital microwave technology to the often technologically underserved and economically distressed communities developed by and managed by The Community Builders. This collaboration to deliver robust broadband access has become an established and viable alternative to traditional local exchange carrier infrastructures which have been inadequate in the low-income communities around Chicago. AR Designs' fixed wireless bypasses buried fiber and copper/coax networks, by utilizing digital microwave/millimeter wave technologies to beam transmissions via an installed base of rooftop mounted radios. This configuration enables the delivery of high speed, high throughput, and yet affordable internet service to our customer base. Its long-standing contractual relationship with Windstream further testifies to AR Designs' financial stability and technical capability.

AR Designs is currently in the process of upgrading its network with its partner Windstream to enable the delivery of a still higher bandwidth capacity to the Designated Service Area. Moreover, AR Designs is working with The Community Builders and Windstream to expand service to four nearby low- income communities.

As described earlier and shown in **Exhibit 1**, AR Designs has been vetted and certified by the State of Illinois as a Minority Business Enterprise (MBE) through the Illinois Department of Central Management Services (CMS), the state's one centralized program to vet all companies interested in doing business with the state. The State of Illinois CMS has particularly high standards for qualification for state programs. It requires all vendors and business partners to have the experience, wherewithal and financial resources to participate in Joint Purchasing

arrangements with other departments and vendors. These demanding business terms allow the local governments to save time and money when purchasing services through aggregated master contracts. The State of Illinois also asks its business partners to qualify for a Vendor Payment Plan which requires higher levels of working capital. Since 2010, A.R. Designs has been vetted and qualified for doing business under the CMS's vendor and business partner programs in order to participate in the Illinois Business Enterprise Program (BEP), which promotes the economic development of businesses owned by minorities, women and persons with disabilities. State agencies and universities are encouraged to spend at least 20% of their procurement budgets with certified BEP companies, and many state solicitations require participation of certified BEP firms.

Since 2009 A.R. Designs has been annually vetted and certified to do business as an MBE on a local and national basis. Locally, it is certified annually by the Chicago Minority Supplier Development Council, Inc. (Chicago MSDC), a premier organization for increasing business opportunities between major buying organizations and minority-owned businesses and a local affiliate of the National Minority Supplier Development Council (NMSDC). The NMSDC is the global leader in advancing business opportunities for certified Asian, Black, Hispanic and Native American business enterprises and their member corporations. The NMSDC requires a thorough annual review of a company's financial and business history, including three (3) years' financial statements, bylaws, board of director and shareholder meeting minutes, all relevant business agreements, leases, deeds and records, including stock certificates, all agreements pertaining to ownership, operation, and control of the business, copies of resumes, copies of driver licenses and proof of US citizenship (birth certificates or U.S. Passports) for all Principals, bank records including copies of cancelled checks, and proof of general liability insurance and

bonding, where applicable. The NMSDC Network maintains a national office in New York and 23 Regional Affiliates across the country. There are 1,750 corporate members throughout the network, including America's top public and privately owned companies as well as universities, hospitals and other buying institutions.

AR Designs' State of Illinois CMS and NMSDC certifications are appended hereto at

**Exhibit 1.**

**G. Terms and Conditions of AR Designs Broadband Internet Access Service Plans (47 C.F.R. § 54.202(a)(6))**

Upon designation as a LBP ETC, AR Designs plans to offer the following BIAS service plan for its Lifeline subscribers in the proposed Designated Service Area:<sup>26</sup>

**Service Features:**

- 300 mbps download and 150 mbps upload speeds
- Unlimited Wi-Fi data usage
- No data cap or overage charges
- No out-of pocket charge to Lifeline-qualified customers.
- Non-Lifeline subscriber rate: \$9.25 with above-listed service features
- No contract, no cancellation penalty charges; no activation or initiation fee, no additional taxes, fees or surcharges apply.

Additionally, for eligible Lifeline subscribers, AR Designs plans to include at no extra charge a Wi-Fi enabled device compliant with the Commission's rules.<sup>27</sup>

Sample Terms and Conditions are appended at **Exhibit 3.**

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<sup>26</sup> 47 C.F.R. § 54.202(a)(6).

<sup>27</sup> See 47 C.F.R. § 54.408(f).

**H. AR Designs Will Advertise the Availability of the Supported Service and the Charges Therefor Through Media of General Distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2))**

AR Designs commits to advertise the availability and cost of its Lifeline BIAS service through media of general distribution.<sup>28</sup> As the *2016 Lifeline Modernization Order* explained, “‘media of general distribution’ is any media reasonably calculated to reach the general public or, for an LBP, the specific audience that makes up the demographic for a particular service offering. For example, for an LBP partnering with a school to offer Lifeline-discounted BIAS to that school’s community, ‘media of general distribution’ may include flyers, newspaper advertisements, or local television advertisements in that school’s geographic area.”<sup>29</sup> AR Designs, which initially will focus on Lifeline BIAS services at the Oakwood Shores community and adjoining areas, will employ flyers, mail and other print and web advertisements, email, and/or text-based methods of advertising “reasonably calculated to reach the relevant community.”<sup>30</sup> AR Designs will also engage in extensive in-person outreach efforts, direct marketing and the Internet to further advertise the availability of its services.

AR Designs will comply with the advertising, marketing, and disclosure requirements set forth in 47 C.F.R. § 54.405.<sup>31</sup> Specifically, all of AR Designs’ print and other materials used to describe or enroll its subscribers in the Lifeline service offering will indicate, using easily understood language, (1) that AR Designs’ low-income targeted service is a Lifeline service; (2) that Lifeline is a government assistance program; (3) that the service is non-transferable; (4) that only eligible consumers may enroll in the program; and (5) that the program is limited to one

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<sup>28</sup> 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2).

<sup>29</sup> *2016 Lifeline Modernization Order*, 31 FCC Rcd at 4094 ¶ 364.

<sup>30</sup> *Id.*

<sup>31</sup> 47 C.F.R. § 54.405.



discount per household. A sample AR Designs application/certification form is appended at **Exhibit 4.**

Additionally, The Community Builders will collaborate with AR Designs in conducting community marketing campaigns and town hall meetings to generate interest in the community network. AR Designs currently works with community health clinics, stores, libraries, schools and community centers to generate awareness about the AR Designs service. As discussed above, AR Designs has formed partnerships with EveryoneOn, The Community Builders, and local community stakeholders to publicize and encourage participation and sign-ups for AR Designs' service upon designation as an LBP by the Commission.

**I. AR Designs Will Comply with All Applicable ETC Obligations (47 U.S.C. § 214(e); 47 C.F.R. §§ 54.201, 54.202)**

To protect the integrity of the Lifeline program and guard against waste, fraud, and abuse, AR Designs will comply with the Commission's additional ETC obligations outlined in sections 54.201 and 54.202 as well as those contained in subpart E of Part 54 of the rules,<sup>32</sup> specifically including the rules regarding subscriber eligibility verification, certification and recordkeeping, and auditing requirements. With regard to eligibility verification, AR Designs will certify and recertify subscribers' eligibility for the Lifeline program, including verifying and confirming subscribers' eligibility, in full compliance with existing section 54.410 of the Commission's rules until the Commission's new National Verifier has been launched in the state encompassing the Designated Service Area (i.e., Illinois). Once the National Verifier is launched in Illinois, AR Designs will enroll subscribers through the National Verifier pursuant to the new provisions of section 54.410 and in accordance with all enrollment guidance provided by the Commission or USAC.

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<sup>32</sup> 47 U.S.C. § 214(e); 47 C.F.R. §§ 54.201, 54.202, 54.400 *et seq.*

**IV. GRANTING AR DESIGNS' PETITION FOR DESIGNATION AS A LIFELINE BROADBAND PROVIDER ELIGIBLE TELECOMMUNICATIONS CARRIER WILL SERVE THE PUBLIC INTEREST**

Section 54.202(b) of the Commission's rules requires that before granting a petition for ETC designation, the Commission must find that grant of the designation would be in the public interest.<sup>33</sup> The Lifeline program serves to further the Act's goals of achieving "[q]uality services" offered at "just, reasonable, and affordable rates" for low-income consumers.<sup>34</sup> In finding that broadband is a supported service for purposes of the Lifeline program, the Commission determined that in expanding "the availability of broadband service for low-income Americans,"<sup>35</sup> an ETC is acting in the public interest. Designation of AR Designs as a LBP ETC will serve the overall public interest, and will benefit low-income consumers in the Designated Service Area in by provisioning high quality broadband service with no out-of-pocket cost to Lifeline subscribers.

In particular, AR Designs' commitment to provide high speed broadband Lifeline service in economically distressed neighborhoods, where traditional incumbent ISPs have failed to invest in the infrastructure necessary to provide broadband service, will directly serve to advance the public interest. AR Designs is currently in the process of deploying additional fiber infrastructure throughout several low-income communities. Moreover, AR Designs understands that both affordable broadband access *and* digital literacy training are critical to further advance the Commission's goal of broadband adoption in low-income communities. To that end, AR Designs has developed a long-term plan, in partnership with low-income developers like The Community

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<sup>33</sup> 47 C.F.R. § 54.202(b).

<sup>34</sup> 47 U.S.C. § 254(b)(1).

<sup>35</sup> See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket Nos. 12-23, 11-42, 03-109, CC Docket No. 96-45, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6673-74 ¶¶ 33-34 (2012) ("2012 Lifeline Reform Order").

Builders and nonprofits like EveryoneOn, to not only deploy advanced broadband network infrastructure, but also foster adoption through targeted programs available to members of low-income communities. As a Minority Business Enterprise (MBE) with a proven track record of providing broadband service and adoption programs to low income communities, upon designation as an LBP ETC, AR Designs will ensure that “[q]uality services” are offered at “just, reasonable, and affordable rates” for low income consumers in economically distressed communities throughout the Designated Service Area.<sup>36</sup>

## **V. ANTI-DRUG ABUSE CERTIFICATION**

AR Designs certifies that no party to this Petition is subject to a denial of federal benefits that includes Commission benefits pursuant to Section 5301 of the anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

## **VI. CONCLUSION**

AR Designs certifies that its Petition for LBP ETC Designation fully satisfies the conditions set forth in the Communications Act, the Commission’s rules pertaining to Lifeline, and the *2016 Lifeline Modernization Order*. Accordingly, AR Designs respectfully requests expeditious approval of its LBP ETC Designation Petition under the Commission’s 60-day

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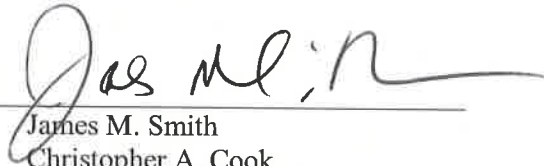
<sup>36</sup> 47 U.S.C. § 254(b)(1).

streamlined review process, so that AR Designs may provide BIAS service to eligible low-income consumers in the Designated Service Area.

Respectfully submitted,

APPLIED RESEARCH DESIGNS, INC.

By

A handwritten signature in dark ink, appearing to read "James M. Smith", is written over a horizontal line.

James M. Smith

Christopher A. Cook

DAVIS WRIGHT TREMAINE LLP

1919 Pennsylvania Avenue, NW

Suite 800

Washington, DC 20006-3401

[jamesmsmith@dwt.com](mailto:jamesmsmith@dwt.com)

(202) 973-4288

Its Attorneys

November 30, 2016

# **VERIFICATION OF APPLIED RESEARCH DESIGNS, INC**

I, James Ratleff, state that I am the Chief Executive Officer of Applied Research Designs, Inc ("Petitioner"); that I am authorized to make this Verification on behalf of Petitioner; that the foregoing filing was prepared under my direction and supervision; and that the statements made in the foregoing filing with respect to Petitioner are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30 day of November, 2016.

  
\_\_\_\_\_  
James Ratleff

**EXHIBIT 1**

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**AR Designs Minority Business  
Enterprise (MBE) Certifications**

THIS CERTIFIES THAT

**APPLIED RESEARCH DESIGNS, INC.**



\* Nationally certified by the: **CHICAGO MINORITY SUPPLIER DEVELOPMENT COUNCIL**

\*NAICS Code(s): 518210; 541512

\* Description of their product/services as defined by the North American Industry Classification System (NAICS)

01/31/2016

Issued Date

CH03476

Certificate Number

01/31/2017

Expiration Date

*Jose B. Wright-Lacy*

Jose B. Wright-Lacy

*Shella C. Morgan*

Shella C. Morgan

By using your password (NMSDC issued only), authorized users may log into NMSDC Central to view the entire profile: <http://nmsdc.org>

*Certify, Develop, Connect, Advocate.*

\* MBEs certified by an Affiliate of the National Minority Supplier Development Council, Inc.\*



ILLINOIS

Bruce Rauner, Governor

DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

March 29, 2016

Daniel Mason  
Applied Research Designs, Inc.  
25245 Trelliage Ave  
Plainfield, IL 60585-1793

Certification Term Expires: March 29, 2017

Re: MBE Recognition Certification Approval  
(CMSDC)

Dear Business Owner:

Congratulations! After reviewing the information that you supplied, we are pleased to inform you that your firm has been granted certification as a Minority Business Enterprise (MBE) under the Business Enterprise Program for Minorities, Females, and Persons with Disabilities.

BEP accepts the Chicago Minority Supplier Development Council's (CMSDC) certification regarding your business status. This outside certification is in effect with the State of Illinois as long as it is valid with the CMSDC.

At least 60 days prior to the anniversary day of your certification, you will be notified by BEP to update your certification as a condition of continued certification. In addition, should any changes occur in ownership and/or control of the business or other changes affecting the firm's operations, you are required to notify BEP within two weeks. Failure to notify our office of changes will result in decertification of your firm.

Please be advised, while this certification does not guarantee you will receive a State contract, it does assure your firm the opportunity to participate in the State's procurement process. Your firm's participation on State contracts will be credited only toward Minority Business Enterprise (MBE) goals in your area(s) of specialty. Your firm's name will appear in the State's Directory as a certified vendor with the Business Enterprise Program (BEP) in the specialty area(s) of:

EDP, CONSULTING SERVICES  
EDP, MAINFRAME/WAN HARDWARE  
EDP, OTHER

Please visit our website at [www.sell2.illinois.gov](http://www.sell2.illinois.gov) to obtain information about current and upcoming procurement opportunities, contracts, forms, and also to register to receive email alerts when the State is preparing to purchase a product or service you may provide.

Thank you for your participation in the Business Enterprise Program (BEP). We welcome your participation and wish you continued success.

Sincerely,

  
Carlos Gutierrez  
Certification Manager  
Business Enterprise Program

(L21MBE)

100 W Randolph St., Suite 4-100, Chicago, IL 60601

Printed on Recycled Paper



**EXHIBIT 2**

**Letters of Support**



Federal Communications Commission

**RE: Lifeline Broadband Provider Application for Applied Research Designs, Inc.**

To Whom It May Concern:

This letter is submitted in support of Applied Research Designs' Lifeline Broadband Provider (LBP) application. We know that The Community Builders has a long history of working with Applied Research Designs, a highly reputable and experienced Minority Business Enterprise (MBE) in the state of Illinois, and its executive team on many phases of inner city and mixed income broadband deployment programs in Chicago since 2004. Applied Research Designs was one of the first to start providing high quality, high-speed wireless broadband services to families in the ConnectHome initiative. Applied Research Designs' service helped address the need for affordable broadband in economically distressed areas of the South Side Chicago that have also been known as "bandwidth deserts," typically at no additional charge to the tenants due to state and local grant programs and private investment. As an LBP, Applied Research Designs will be able to offer even higher quality high-speed Wi-Fi Internet and other broadband services to ConnectHome communities and customers in Illinois, and eventually in ConnectHome communities across the nation.

EveryoneOn is working with The Community Builders and Applied Research Designs in anticipation of their forthcoming rollout in Chicago and other parts of Illinois to lower Internet access cost, speed up Internet adoption and utilization of broadband technology by low-income residents, and narrow the digital divide across Chicago. We have designed an internet access and adoption template that can be duplicated within underserved communities throughout the country. EveryoneOn is looking forward to working with Applied Research Designs and The Community Builders to assist in delivering lessons learned about access and adoption techniques to underserved communities on the South Side of Chicago.

We look forward to working with Applied Research Designs as a Lifeline Broadband Provider to deliver affordable high-speed Internet access and economic opportunity to residents in low-income and bandwidth underserved communities.

Sincerely,

Chike Aguh

Chief Executive Officer

EveryoneOn

Federal Communications Commission

**RE: Lifeline Broadband Provider Application for Applied Research Designs, Inc.**

To Whom It May Concern:

This letter is submitted in support of the Lifeline Broadband Provider (LBP) application of Applied Research Designs, Inc. The Community Builders have partnered with Applied Research Designs, a highly reputable and experienced Minority Business Enterprise (MBE) in the state of Illinois, and its executive team on many phases of inner city and mixed income broadband deployment programs in Chicago for over a decade. Through its superior technology and innovation, Applied Research Designs has provided high quality, high speed wireless broadband services to our tenants, particularly addressing needs in the types of areas of South Side Chicago that have been known as "bandwidth deserts," typically at no additional charge to the tenants due to state, local grant programs, and private investment. As a LBP, Applied Research Designs will be able to offer even higher quality high speed internet, Wi-Fi and other broadband services to low income communities and customers in Illinois and eventually in other states.

The Community Builders and Applied Research Designs are working with the Federal EveryoneOn/ConnectHome pilot program to lower Internet access cost, speed up Internet adoption and utilization of broadband technology by low-income residents and narrow the digital divide of underserved communities across Chicago. Working through the EveryoneOn/ ConnectHome pilot program we are looking to launch a significant LBP presence in Chicago in 2017. We have designed an internet access and adoption template that can be duplicated within underserved communities throughout the country, by connecting residents with experts and opportunities covering; job training, health, finance, business, and education. This kind of direct fiber and fixed wireless connection project will have tremendous positive impacts for Chicago South Side communities, and their surrounding schools, clinics, parks and businesses. Applied Research Designs is a key partner in our goal to bring ever-greater digital literacy through high speed broadband service to other surrounding low income communities.

We look forward to continuing to work in close partnership with Applied Research Designs as a Lifeline Broadband Provider to accomplish our common goal of bringing greater digital literacy and opportunity to low income populations through easily accessible and readily adoptable high speed, low cost broadband. We enthusiastically endorse and support Applied Research Designs' LBP application to the FCC, and we urge its swift approval.

Sincerely,



Jessie Schnell, Development Operations

**EXHIBIT 3**

**AR Designs Sample Terms & Conditions**

## **BANDWIDTH COMMUNITY NETWORK (BC NETWORK) TERMS AND CONDITIONS OF SERVICE**

Please read these Terms and Conditions of Service carefully. These Terms and Conditions of Service are a legally binding agreement ("Agreement") between you and BC Network. BC Network is a brand of AR Designs, Inc.

**THESE TERMS AND CONDITIONS OF SERVICE CONTAIN IMPORTANT INFORMATION ABOUT YOUR LEGAL RIGHTS AND REQUIRE THAT CERTAIN DISPUTES BE RESOLVED THROUGH ARBITRATION INSTEAD OF A COURT TRIAL. FOR MORE INFORMATION SEE BELOW.**

By enrolling in the BC Network program (the "BC Network Program") and by using the BC Network service (the "BC Network Service"), you ("you"), the participant, acknowledge and agree to the following Terms and Conditions of Service. AR Designs reserves the right to change or modify any of these Terms and Conditions of Service at any time and at its sole discretion. Any changes or modifications to these Terms and Conditions of Service will be binding upon you once posted on our website. Because these Terms and Conditions of Service are subject to change at any time you should always check our website for the most current version.

When you accept these Terms of Service, you represent that you are at least 18 years of age and that you meet the eligibility standards for BC Network service.

### **LIFELINE PROGRAM**

BC Network's "Lifeline" service offering is subsidized by the Universal Service Fund Lifeline program and administered by the Universal Service Administrative Company. In order to qualify for enrollment in the BC Network Lifeline Program, a person must meet certain eligibility requirements. These requirements are based on a person's participation in a state or federal support program(s) or by meeting certain income requirements based upon the Income Poverty Guidelines as defined by the US Government. Federal law limits the availability of the Lifeline Benefits. Among other things, Federal law permits only one Lifeline benefit per household (which is defined as any individual or group of individuals who live together at the same address and share income and expenses). Applicants for the BC Network Program must complete an application form, provide supporting documentation that they meet the eligibility requirements and certify, under penalty of perjury, that they:

- Are eligible for and currently receive benefits from the public assistance program(s) identified in the application form, or that they have income at or below the designated eligibility level.
- Understand they may be required to recertify their continued eligibility at any time, and that failure to recertify will result in the loss of their benefits.
- Do not currently receive Lifeline support for a telephone line serving their household and no other resident in their household participates in the Lifeline program.
- Will notify BC Network within 30 days if they no longer qualify for any of the public assistance programs identified in their application form, no longer meet the criteria for

income eligibility, if another member of their household receives Lifeline benefits, or if they no longer qualify for Lifeline for any other reason.

- Will notify BC Network of any change of address within 30 days.
- Reviewed the information contained in their application and it is true and correct to the best of their knowledge and belief, and that they understand that providing false or fraudulent information to obtain Lifeline benefits is punishable by law.

You may be required to provide copies of documents proving your eligibility to participate in Lifeline. You should not send original documents to BC Network. Documents sent to BC Network will not be returned. BC Network is not responsible for any losses resulting from the destruction of documents sent to BC Network.

Applicants who qualify and are enrolled in the BC Network Program will receive a high-speed internet for \$9.25 (covered in full by the federal Lifeline program subsidy), with unlimited bandwidth usage each month. BC Network will determine whether or not an applicant meets the eligibility requirements to participate in the BC Network Program.

Applicants who do not meet the eligibility requirements will receive an email notification, of the reason for their non-eligibility. Upon enrollment in the BC Network Program, you will be qualified to participate for up to one (1) year. To continue your enrollment in the BC Network Program after the initial year, you must re-certify annually that you are qualified for continued enrollment in the BC Network Program as required by the Federal Communications Commission (FCC). If BC Network determines during its re-certification efforts, or at any other time, that a customer fails to continue to qualify for the BC Network Program, such customer will immediately be deemed ineligible to participate in the BC Network Program, will be de-enrolled from the BC Network Program and will no longer receive the free monthly service. BC Network Customers who are no longer eligible (for any reason) for enrollment in the BC Network Program must, within 30 days, notify BC Network that they no longer meet the eligibility requirements for enrollment. A BC Network customer's enrollment may also be cancelled upon the request of a state and/or federal authority.

BC Network reserve the right to cancel the enrollment of any customer and/or permanently deactivate any customer's BC Network access for fraud, misrepresentation or other misconduct as determined solely by BC Network. While participating in the BC Network Program, a customer shall not be permitted to give away or in any way allow another person to use the service account information provided to him/her by BC Network.

#### Service Features

- 300 mbps download and 150 mbps upload speeds
- Unlimited Wi-Fi data usage
- No data overage charges
- Non-Lifeline subscriber rate: \$9.25 with listed service features

### **\$9.25 /mo for 300 mbps**

- 300 mbps and 150 mbps w/ No "0" GB/mo data cap
- 1-year rate.
- No Contract.
- No extra charge or usage fee
- No setup or installation fees
- No modem required. No fee.
- Free for eligible Lifeline customers
- \$9.25 /mo for non Lifeline customers including features mentioned above

Lifeline Program support by limiting the eligibility criteria to:

- SNAP,
- Medicaid,
- Supplemental Security Income (SSI),
- Federal Public Housing Assistance,
- The Veteran's Pension or Survivor's Pension benefit.
- Income-based eligibility at or below 135% of the federal poverty guidelines.

### **Availability**

To be eligible for BC Networks' Lifeline service, you must meet the applicable eligibility standards described in these Terms of Service and reside within a BC Network, ETC service area.

**Non-Rated Content.** BC Network and AR Designs strive to present and offer only generally acceptable content. However, it is impossible to proof all content, titles and news articles for appropriate content. Our wireless content is NOT rated and you are solely responsible for the use of such material, which may be offensive or objectionable to you or to others. You agree not to hold BC Network or AR Designs liable for any offensive or objectionable content.



## SERVICES FOR UNLIMITED PLANS

**Non-Rated Content:** Content that can be accessed or viewed by using your Services is not rated or filtered by BC Network and you are solely responsible for the use of such material, which may be offensive or objectionable to you or to others. Anytime you use Services, you agree not to hold BC Network liable for any offensive or objectionable content. In the event that you, as a legal guardian allow your child to use your Services, you acknowledge that your child has the permission to use the Services available on your device, including, without limitation, email and web browsing capabilities. You further acknowledge that as a legal guardian, it is your responsibility to determine whether use of Services is appropriate for your child. If you browse the internet using Services, you agree that you are of the minimum legal age to visit certain sites and you agree not to visit any illegal sites. Not all websites will be available with the BC Network Service. Access to certain websites may be blocked or unavailable due to carrier or other restrictions.

Data Services are for individual use only and may not be offered for resale. BC Network reserves the right to take measures to protect the Provider's networks and other users from harm, compromised capacity or degradation in performance. These measures may impact your Service, and we reserve the right to deny, modify or terminate your Services, with or without notice, if we believe you are using your Services in a manner that adversely impacts a Provider's network. We may monitor your compliance with these Terms and Conditions, but we will not monitor the content of your communications except as otherwise expressly permitted or required by law.

## UNLIMITED PLANS INTENDED USE

BC Network Unlimited Plan may not be used for certain unauthorized uses that adversely impact our service. Examples of unauthorized uses include, without limitation, the following: (i) uploading, downloading or streaming of uninterrupted continuous video; (ii) server devices or host computer applications, including, but not limited to, web camera posts or broadcasts, automatic data feeds, automated machine-to-machine connections or peer-to-peer ("P2P") file sharing; or (iii) as a substitute or backup for private lines or dedicated data connections. A customer engaged in any unauthorized use of BC Network Service may have his/her Service throttled and/or terminated. Customers will be provided notice and an opportunity to take corrective action with respect to unauthorized uses before their service is terminated.

BC Network may discontinue providing Service to you, discontinue your account, terminate data connections and/or reduce data throughput speeds for customers whose usage, in the sole judgment of BC Network: (1) appear likely to generate abnormally high data usage compared to the usage of other BC Network customers or (2) may be harmful, disruptive, or interfere with the BC Network's service or the ability to provide quality service to other customers. By initiating Service, you acknowledge and agree to BC Network's right to terminate your Service under these circumstances.

BC Network may modify or cancel any Service or take corrective action at any time without prior notice and for any reason, including but not limited to your violation of this agreement.



## DISPUTE RESOLUTION

Most customer concerns can be resolved quickly and to the customer's satisfaction by calling our Customer Care department. As such, you agree that you will first contact us with any dispute and provide a description of the nature of the dispute, all relevant documents, other information concerning the dispute, and your proposed resolution before taking any formal action. If we are unable to reach a resolution of your dispute within 30 days of your notice to us, you agree that you will submit the dispute to binding arbitration as set forth in this provision rather than filing a lawsuit.

**Binding Arbitration** It is intended that this provision be interpreted broadly to encompass all disputes or claims arising out of our relationship. Any dispute or claim, including those against any of our subsidiary, parent or affiliate companies, arising out of or relating to this Agreement, our Privacy Policy or the Service or any service used in connection with the Service (whether based in contract, tort, statute, fraud, misrepresentation or any other legal theory) will be resolved by binding arbitration except that (1) you may take claims to small claims court if they qualify for hearing by such a court, or (2) you or we may choose to pursue claims in court if the claims relate solely to the collection of any debts you owe to us.

**Arbitration Procedures.** You must first present any claim or dispute to us by contacting Customer Care to allow us an opportunity to resolve the dispute. You may request arbitration if your claim or dispute has not been resolved within 90 days. The arbitration of any dispute or claim shall be conducted in accordance with the American Arbitration Association ("AAA") under the Wireless Industry Arbitration Rules ("WIA Rules"), as modified by this Agreement. The WIA Rules and information about arbitration and fees are available upon request from the AAA online at [www.adr.org](http://www.adr.org). You and we agree that this Agreement evidences a transaction in interstate commerce and this arbitration provision will be interpreted and enforced in accordance with the Federal Arbitration Act and federal arbitration law. Unless you and we agree otherwise, any arbitration will take place in the county seat for the county in which your billing address is located. At either party's election, the arbitration shall be held telephonically. An arbitrator may award any relief or damages (including injunctive or declaratory relief) that a court could award, except an arbitrator may not award relief in excess of or contrary to what this Agreement provides and may not order relief on a consolidated, class wide or representative basis. In any arbitration applying the WIA Rules applicable to large/complex cases, the Arbitrators must also apply the Federal Rules of Evidence, and the losing party may have the award reviewed in accordance with the review procedures set forth in the WIA Rules. Judgment on any arbitration award may be entered in any court having proper jurisdiction. If any portion of this arbitration clause is determined by a court to be inapplicable or invalid, then the remainder shall still be given full force and effect.

**Waiver of Class Actions.** By this Agreement, both you and we are waiving certain rights to litigate disputes in court. You and we both agree that any arbitration will be conducted on an individual basis and not on a consolidated, class wide or representative basis. If for any reason this arbitration clause is deemed inapplicable or invalid, or to the extent this arbitration clause

allows for litigation of disputes in court, you and we both waive, to the fullest extent allowed by law, any right to pursue any claims on a class or consolidated basis or in a representative capacity.

### **Our Right to Make Changes**

These Terms of Service may change at any time, including the prices for BC Networks' service. Unless expressly prohibited by law, we reserve the right to modify or cancel this service or your account or take corrective action at any time and for any reason, including, but not limited to, your violation of any provision of these Terms of Service. Your right to use our service is subject to our business policies, practices and procedures, rates and these Terms of Service, which we may change at any time.

Unless prohibited by law, we reserve the right to modify, change, or cancel any part of your service at any time including but not limited to rates, charges, how we calculate charges, discounts, coverage, technologies used to provide services, or your Terms.

### **Limitation of Liability**

Unless prohibited by law, BC Network and you agree to limit claims for damages or other monetary relief against each other to direct and actual damages. You agree that BC Network and its business partners are not liable to you or any third party for any indirect, special, incidental, consequential, exemplary, or punitive damages of any kind, including lost profits (regardless if we have been notified that such loss may have occurred by reason of any act or omission in or provision of services or under any legal theory, including fraud, misinterpretation, breach of contract, personal injury, product liability or any other theory.

### **Indemnification**

You agree to indemnify and hold harmless BC Network and its affiliates and their respective officers, agents, partners and employees, from any and all liabilities, settlements, penalties, claims, causes of action and demands brought by third parties (including any costs, expenses or attorneys' fees on account thereof), resulting from your use of BC Network services, or another person whom you authorize to use your services, whether based in contract or tort (including strict liability) and regardless of the form of action.

### **Effect of Terms of Service**

These Terms of Service supersede all oral or written communications and understandings between you and BC Network with respect to our services to you and the terms under which they are offered and provided to you.

**Service End Date:** Your "Service End Date" is the last day of your Service period. When you renew Services, your Service End Date will be reset to the number of Service Days on your renewed plan.

**EXHIBIT 4**

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**Model Lifeline Certification Form**

## Lifeline Initial Certification Form

If you have Lifeline (free or reduced phone service) with another company, do you give [ETC Name] permission to transfer the Lifeline service? If you answer yes, you will lose the discount with the other company. If you answer no, you may not receive Lifeline on this account.

☐ Yes, transfer my Lifeline service ☐ No, do not transfer my Lifeline service ☐ I do not currently have Lifeline

Please complete Sections 1, 2 and 3 below. You must provide proof of your eligibility along with this application.

### SECTION 1 - Applicant Information

First Name

Middle Name/Initial

Last Name

Date of Birth

Last 4-Digits of SSN

Phone Number

Email Address

Residential Street Address (No P.O. Boxes)

Unit #

City

State

Zip Code

Is your residential address permanent? ☐ Yes

☐ No

Mailing Address (if different)

Unit #

City

State

Zip Code

**Eligible Person's Information. Only complete this part if the person who qualifies for Lifeline is not the Applicant (such as a dependent child).**

First Name

Last Name

Date of Birth

Last 4-Digits of SSN

Relationship to Applicant

### SECTION 2 - Eligibility Information

By checking a box below, I certify that I, my dependent, or my household receives assistance from at least one of the programs listed below, or that my total household income is at or below 135% of the Federal Poverty Guidelines, and that I have provided proof of eligibility.

#### Select Only One

- ☐ Supplemental Nutrition Assistance Program (SNAP)  
☐ Medicaid  
☐ Supplemental Security Income (SSI)  
☐ Low Income Home Energy Assistance Program (LIHEAP)  
☐ National School Lunch free lunch program  
☐ Federal Public Housing Assistance or Section 8  
☐ Temporary Assistance For Needy Families (TANF)

- ☐ Total Household Income at or below 135% of the Federal Poverty Guidelines  
\_\_\_\_\_ = Number of people in household

#### 135% of the Federal Poverty Guidelines for 2015

- 1 person up to \$15,890  
2 people up to \$21,506  
3 people up to \$27,122  
4 people up to \$32,738  
5 or more people - add \$5,616 for each extra person

### SECTION 3 - Certification

By checking each line and signing below, I certify, under penalty of perjury, that:

- ☐ I certify that the information provided above is true and correct to the best of my knowledge. I understand that Lifeline is a government program, and that I may be punished if I knowingly provide false or untrue information to receive Lifeline. Punishment may include being fined, imprisoned, or barred from the Lifeline program.
- ☐ I understand that I must notify the telephone company within 30 days if: (1) I, or the eligible person in my household, no longer meets the program or income eligibility criteria, or any other qualifying criteria, (2) I move to a new address, or (3) my household receives more than one Lifeline discounted telephone. I understand that I may be penalized for failing to notify the phone company of these issues.
- ☐ Your household may receive Lifeline on one wireless OR one home telephone, but not both. Your household may not receive the Lifeline benefit from more than one telephone company. A household is an individual or group of individuals who live together at the same address and share income and expenses.
- ☐ I give the telephone company permission to release to the Universal Service Administrative Company (USAC) or its agent any records required to confirm that my household only receives one Lifeline benefit. If USAC finds that my household receives more than one Lifeline benefit, USAC will notify the telephone companies, and I will have to select one service and I will be de-enrolled from the other.
- ☐ I understand that I must recertify my Lifeline eligibility every year and that I will lose my Lifeline benefit if I do not recertify each year.

Signature

Date

Send the completed form and proof of eligibility to:

MAIL: [ETC ADDRESS]

FAX: [ETC FAX NO.] EMAIL: [ETC EMAIL ADDRESS]

Note: You may not transfer your Lifeline discount to another person, even if he or she is eligible.